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Advocates for Workplace Fairness

September 14, 2011

By Facsimile to (212) 805-7949

The Honorable P. Kevin Castel
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: Lacovara, et al. v. Hard Rock Cafe Int'l (USA), Inc., et al., 10 Civ. 7821 (PKC)

Dear Judge Castel:

We represent the Plaintiffs and a putative class of Hard Rock Café special event workers in the above-referenced matter. We write jointly with counsel for the Defendants to update the Court regarding the status of the parties' settlement negotiations and to respectfully request that the Court adjourn the pretrial conference scheduled for September 16, 2011, at 12:30 pm.

The parties are close to finalizing a settlement agreement and a joint motion seeking preliminary approval of the settlement and conditional certification of the settlement class, which they hope to be in a position to file with the Court by early October if not sooner.

Respectfully submitted,



Rachel Bien

cc: Jonathan Sulds, Esq. (by email)
 Jeftold Goldberg, Esq. (by email)
 Dana Sussman, Esq.

